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January 30, 2025

VIA EMAIL

Hon. Katherine Polk Failla
United States District Judge
United States District Court for the
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: Massachusetts Mutual Life Insurance Company v. Broadway 340 Madison Fee LLC, et al., Case No. 1:24-cv-03865 (KPF)(RFT)

Dear Judge Failla:

We write jointly on behalf of Defendant Broadway 340 Madison Fee LLC (“Borrower”) and Plaintiff Massachusetts Mutual Life Insurance Company (“Lender,” together with Borrower, the “Parties”) to mutually request a further 60-day adjournment of all deadlines in the above-referenced matter in light of the Stipulation and Order Appointing a Receiver (ECF No. 122) entered on December 16, 2024.

We thank the Court for its time and consideration.



Hon. Katherine Polk Failla
Page 2

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By: /s/ Alan M. Feld

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*Attorneys for Plaintiff Massachusetts Mutual Life
Insurance Company*

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Madison Fee LLC*

Application GRANTED. All deadlines in this matter are hereby
ADJOURNED for an additional 60 days.

For administrative purposes only, the Court is DENYING without
prejudice to renew Plaintiff's motion for partial summary judgment.
(Dkt. #96). Should Plaintiff ultimately seek to renew its motion,
Plaintiff is welcome to do so.

The Clerk of Court is directed to terminate the pending motions at
docket entry 96 and 126.

Dated: January 31, 2025
New York, New York

SO ORDERED.

A handwritten signature in blue ink that reads 'Katherine Polk Failla'.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE